

STATE OF MARYLAND \* NO. C-10-CR-23-000542

V. \* IN THE CIRCUIT COURT FOR

CARLOS JAVIER GUZMAN-CRUZ \* FREDERICK COUNTY, MD

\* \* \* \* \* \* \* \* \* \* \* \* \*

**STATE'S DISCLOSURE WITHOUT REQUEST**

1. The State has provided to the (Defendant) or (Defense counsel) all items within Maryland Rule 4-263 and objects to any request outside Maryland Rule 4-263. The State further acknowledges its continuing duty to supplement Discovery promptly upon receipt of further discoverable information, pursuant to Maryland Rule of Procedure 4-263 (j).
2. Pages numbered 1-115.
3. Shielded version(s) of Body Worn Camera (2022-094147) pursuant to Md. Code Ann., Cts. & Jud. Proc. § 10-402 and Md. Code Ann., Pub. Safety § 3-511.
4. 179 Axon pictures sent through Evidence.com.
5. Witnesses for the State:
  - a. Dfc. Kayla Staub, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - b. Det. Joseph Rowe, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - c. Sgt. Robert Deckhut, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - d. Dfc. Takin Abbasian, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - e. Lt. Andrew Crone, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - f. Sgt. Jeffrey Hyatt, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - g. Dfc. Jessica Dixon, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - h. Dfc. Alexander Crane, FCSO, 110 Airport Drive East, Frederick, MD 21701
  - i. Zayda Guzman, 10337 Quillback Street, New Market, 21774

6. State's Expert Witness:

a. Cpl. Jayson Snyder, FCSO, 110 Airport Drive East, Frederick, MD 21701

7. Pursuant to Maryland Rule 4-263(d)(7)(B), the State is required to disclose copies of the written policies relating to pretrial eyewitness identification involving participation by personnel from the local law enforcement agencies. The State hereby discloses the policies of Frederick County Sheriff's Office for the above captioned case. The State acknowledges its continuing duty of disclosure.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30th day of June, 2023, a copy of the foregoing State's Disclosure Without Request was sent via MDEC, a bulk download link via evidence.com and/or Citrix, a secure file sharing service, to the designated e-mail address and/or service contact for Margaret Teahan, Esquire, Attorney for Defendant herein.



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